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6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 ROSA BAGHDASARIAN, an individual,
Plaintiff,
9 vs.

CASE NO: 2:18-cv-01809-RFB-DJA

10 LOWE'S HOME CENTER, LLC. dba
LOWE'S HOME CENTER, LLC-STORE #
11 0784, a Foreign Limited-Liability Company,
DOES I through X, inclusive; and ROE
12 CORPORATIONS I through X, inclusive,

**STIPULATION AND ORDER TO
EXTEND JOINT PRE-TRIAL ORDER
(SIXTH REQUEST)**

13 Defendants.

14 The parties, by and through their respective counsel of record, hereby stipulate and request
15 that this Court extend the Joint Pre-Trial Order deadline of May 14, 2020 in the above-captioned
16 matter for Thirty (30) days from the previous deadline, to June 15, 2020 **for the limited purpose of**
17 **conducting one additional deposition, as detailed below.** In support of this stipulation, the
18 parties state as follows:

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20 **I. DISCOVERY COMPLETED**

- 21 1. The parties have served initial disclosures pursuant to Fed. R. Civ. P. 26(a).
- 22 2. The parties have each served two supplements to their initial Rule 26(a) disclosures.
- 23 3. Defendant has propounded interrogatories and requests for production of documents, and
24 Plaintiff has served responses thereto.
- 25 4. Plaintiff has propounded two sets of interrogatories, two sets of request for production of
26 documents, and one set of requests for admission, and Defendant has served responses
27 thereto.
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FIRM



5. Defendant has taken the deposition of non-party Robert Charles.

6. Defendant has taken the deposition of Plaintiff.

7. The parties have served initial expert disclosures.

8. Defendant has taken the deposition of non-party witness Kamran Zahedi.

II. LIMITED, ADDITIONAL DEPOSITION SOUGHT FOR COMPLETION

1. Plaintiff will take the deposition of Defendant's employee, Laurene Stevens.

III. GOOD CAUSE/EXCUSABLE NEGLIGENCE SUPPORTING REQUESTED RELIEF

Discovery is essentially complete in this matter. However, the parties have been unable to secure the testimony of one additional witness, Laurene Stevens. The parties have sought to depose Ms. Stevens for approximately three months, but she has been (understandably) unavailable to appear as a result of both traveling out of state and concerns regarding the ongoing Coronavirus pandemic. The parties anticipate Ms. Stevens' testimony will prove critical to their assessment of underlying liability issues. Fortunately, Ms. Stevens is now available and willing to appear, and is currently scheduled to be deposed on **May 12, 2020**.

The parties recognize and acknowledge the importance of the Court's deadlines, and similarly understand the importance of adhering thereto. The parties respectfully submit that, under the current circumstances, there exists good cause justifying the relief sought herein.

IV. PROPOSED, REVISED SCHEDULE

The parties' proposed, revised schedule for the completion of this deposition as follows:


Scheduled Event	Current Deadline	Proposed Deadline
Discovery Cut-off	March 16, 2020	To remain closed
Amendment to Pleadings	Closed	To remain closed
Interim Status Report	Completed	N/A
Expert Disclosure	Closed	To remain closed
Rebuttal Expert Disclosure	Closed	To remain closed



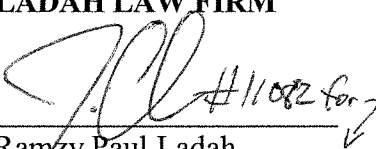
Dispositive Motions	May 14, 2020	May 14, 2020
Joint Pretrial Order	Thursday, May 14, 2020	Monday, June 15, 2020

WHEREFORE, the parties respectfully request that this Court extend the deadline for filing the Joint Pre-Trial Order by 30 days in accordance with the table above.

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& STOBERSKI**


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ORDER

Based upon the foregoing stipulation of the parties, and good cause appearing therefor, it is hereby ORDERED that the deadline to file the Joint Pretrial Order shall be extended in this matter, as follows:

Scheduled Event	Current Deadline	Proposed Deadline
Discovery Cut-off	March 16, 2020	To remain closed
Amendment to Pleadings	Closed	To remain closed
Interim Status Report	Completed	N/A
Expert Disclosure	Closed	To remain closed
Rebuttal Expert Disclosure	Closed	To remain closed
Dispositive Motions	May 14, 2020	May 14, 2020
Joint Pretrial Order	Thursday, May 14, 2020	Monday, June 15, 2020

IT IS SO ORDERED.

Dated this 15th day of May

2020.



U.S. MAGISTRATE JUDGE

